

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

# WINIFRED BLACKLEDGE

**Plaintiff,**

**VS.**

**CIVIL ACTION NUMBER:**

**2:06-cv-321-ID**

**ALABAMA DEPARTMENT OF  
MENTAL HEALTH & MENTAL  
RETARDATION & COMMISSIONER  
JOHN HOUSTON, in his Official  
as Commissioner of the Alabama  
Capacity Department of Mental Health  
& Mental Retardation**

## JURY DEMAND

**UNOPPOSED**

## Defendants.

**UNOPPOSED MOTION TO EXTEND PLAINTIFF’S SUMMARY JUDGMENT  
RESPONSE DEADLINE AND DEFENDANT’S REPLY DEADLINE**

COMES NOW, Plaintiff in this action and move this Court to extend the summary judgment response deadline two weeks from July 17, 2007 until August 1, 2007 and Defendant's Reply deadline from July 27, 2007 until August 13, 2007. As grounds Plaintiff states as follows:

1. Counsel for Plaintiff, Joshua D. Wilson, will be out of town from July 4-8, 2007 on a previously scheduled vacation.
2. Counsel for Plaintiff has depositions scheduled on July 9, 11, 13, and 17, 2007 in two separate cases and must spend extensive time preparing for said depositions.
3. Rocco Calamusa, another attorney working on this case, was recently in a horse-riding

accident and will be out of work for an extended period of time.

4. Counsel for Plaintiff has a pretrial conference scheduled on July 18, 2007 in the case of *Denise Bonner et. al. v. Chambers County, et. al.*, 3:04-CV-01229-WKW, a multi-party lawsuit. Plaintiff has a pretrial conference scheduled on July 23, 2007 in the case of *Elizabeth Hutchinson v. Phenix City Board of Education*, CV-06-0700-WHA. Both of these pretrial conferences will require extensive preparation.
5. Counsel for Plaintiff further states that an extension should be granted to Defendants allowing them to Reply from the current date of July 27, 2007 until August 13, 2007.
6. Counsel for Plaintiff has discussed these extensions with Courtney Tarver, Counsel for Defendant, who is Unopposed to said extension.
7. Counsel for Plaintiff and Counsel for Defendant are in agreement that such extension should not cause any other delay or the extension of any other deadlines. The Pretrial Conference in this case is not scheduled until October 1, 2007 and the Trial is not scheduled until November 5, 2007.

Respectfully submitted,

/s/ Joshua D. Wilson  
Joshua D. Wilson  
*Attorney for the Plaintiff*

**OF COUNSEL:**

WIGGINS, CHILDS, QUINN & PANTAZIS, LLC  
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**CERTIFICATE OF SERVICE**

I do hereby certify that I have filed a copy of the above and foregoing by filing the same with the EC/CMF system, which will provide notification to the following:

TROY KING  
ATTORNEY GENERAL

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This the 2<sup>nd</sup> Day of July, 2007.

/s/ Joshua D. Wilson  
Of Counsel